

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Target Corporation Customer Data
Security Breach Litigation

This document relates to:
All Financial Institution Cases

MDL No. 14-2522 (PAM/JJK)

**FINANCIAL INSTITUTION PLAINTIFFS' MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT AND NOTICE PLAN**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Financial Institution Plaintiffs, Umpqua Bank, Mutual Bank, Village Bank, CSE Federal Credit Union, and First Federal Savings of Lorain (collectively, "Plaintiffs"), by their counsel, hereby move this Court for entry of an Order: (1) certifying the Settlement Class for purposes of settlement; (2) appointing Financial Institution Plaintiffs as representatives of the Settlement Class; (3) appointing Financial Institution Plaintiffs' Co-Lead Counsel and the undersigned counsel as Settlement Class Counsel; (4) granting preliminary approval of the proposed Settlement; (5) approving the proposed form and manner of notice to the Settlement Class; (6) directing that the notice to the Settlement Class be disseminated by Settlement Administrator, Dahl Administration LLC, in the manner described in the Settlement and in the Declaration of Jeffrey D. Dahl; (7) establishing a deadline for Settlement Class members to request exclusion from the Settlement Class or file objections to the Settlement; and (8) setting the proposed schedule for completion of further settlement proceedings, including scheduling the final fairness hearing.

This Motion is based on the record in this case as well as: (1) Financial Institution Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Notice Plan; (2) the Declaration of Charles S. Zimmerman in Support of the Financial Institution Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Notice Plan and attached exhibits; (3) the Declaration of Jeffrey D. Dahl with Respect to Settlement Notice Plan; and (4) the Proposed Preliminary Approval Order that are served and filed herewith, as well as any additional materials or argument that may be presented to the Court.

Dated: December 2, 2015

Respectfully submitted,

CHESTNUT CAMBRONNE PA

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By: /s/ Karl L. Cambronne

By: /s/ Charles S. Zimmerman

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